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BEFORE THE
BOARD OF VOCATIONAL NURSING
AND PSYCHIATRIC TECHNICIANS
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

In the Matter of the Statement of Issues
Against:

Case No. PT-2007-945

GLENN ALLEN WATSON
24915 Brodiaea Avenue
Moreno Valley, CA 92553

Applicant for Vocational Nurse License

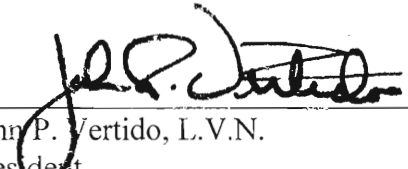
Respondent.

DECISION

The attached Stipulated Settlement and Disciplinary Order is hereby adopted by the Board of Vocational Nursing and Psychiatric Technicians as the final Decision in the above-entitled matter.

This Decision shall become effective on June 9, 2010.

IT IS SO ORDERED this 10th day of May, 2010.



John P. Vertido, L.V.N.
President

1 EDMUND G. BROWN JR.
Attorney General of California
2 LINDA K. SCHNEIDER
Supervising Deputy Attorney General
3 MARICHELLE S. TAHIMIC
Deputy Attorney General
4 State Bar No. 147392
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5 San Diego, CA 92101
P.O. Box 85266
6 San Diego, CA 92186-5266
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7 Facsimile: (619) 645-2061
Attorneys for Complainant

8
9 **BEFORE THE**
BOARD OF VOCATIONAL NURSING AND PSYCHIATRIC TECHNICIANS
10 **DEPARTMENT OF CONSUMER AFFAIRS**
STATE OF CALIFORNIA

11 In the Matter of the Statement of Issues
12 Against:

13 **GLENN ALLEN WATSON**
24915 Brodiaea Ave
14 Moreno Valley, CA 92553

15 Respondent.

Case No. PT-2007-945

OAH No. 2009091381

**STIPULATED SETTLEMENT AND
DISCIPLINARY ORDER**

16
17 In the interest of a prompt and speedy settlement of this matter, consistent with the public
18 interest and the responsibility of the Board of Vocational Nursing and Psychiatric Technicians of
19 the Department of Consumer Affairs, the parties hereby agree to the following Stipulated
20 Settlement and Disciplinary Order which will be submitted to the Board for approval and
21 adoption as the final disposition of the Statement of Issues.

22 **PARTIES**

23 1. Teresa Bello-Jones, J.D., M.S.N., R.N. (Complainant) is the Executive Officer of the
24 Board of Vocational Nursing and Psychiatric Technicians. She brought this action solely in her
25 official capacity and is represented in this matter by Edmund G. Brown Jr., Attorney General of
26 the State of California, by Marichelle S. Tahimic, Deputy Attorney General.

27 ///

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2. Respondent Glenn Allen Watson (Respondent) is representing himself in this proceeding and has chosen not to exercise his right to be represented by counsel.

3. On or about June 22, 2007, Respondent filed an application dated June 4, 2007, with the Board of Vocational Nursing and Psychiatric Technicians to obtain a psychiatric technician license.

JURISDICTION

4. Statement of Issues No. PT-2007-945 was filed before the Board of Vocational Nursing and Psychiatric Technicians (Board), Department of Consumer Affairs, and is currently pending against Respondent. The Statement of Issues and all other statutorily required documents were properly served on Respondent on September 23, 2009. A copy of Statement of Issues No. PT-2007-945 is attached as exhibit A and incorporated herein by reference.

ADVISEMENT AND WAIVERS

5. Respondent has carefully read, and understands the charges and allegations in Statement of Issues No. PT-2007-945. Respondent has also carefully read, and understands the effects of this Stipulated Settlement and Disciplinary Order.

6. Respondent is fully aware of his legal rights in this matter, including the right to a hearing on the charges and allegations in the Statement of Issues; the right to be represented by counsel at his own expense; the right to confront and cross-examine the witnesses against him; the right to present evidence and to testify on his own behalf; the right to the issuance of subpoenas to compel the attendance of witnesses and the production of documents; the right to reconsideration and court review of an adverse decision; and all other rights accorded by the California Administrative Procedure Act and other applicable laws.

7. Respondent voluntarily, knowingly, and intelligently waives and gives up each and every right set forth above.

CULPABILITY

8. Respondent admits the truth of each and every charge and allegation in Statement of Issues No. PT-2007-945.

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1 9. Respondent agrees that his application for a Psychiatric Technician License is subject
2 to denial and he agrees to be bound by the Board of Vocational Nursing and Psychiatric
3 Technicians (Board)'s imposition of discipline as set forth in the Disciplinary Order below.

4 **CONTINGENCY**

5 10. This stipulation shall be subject to approval by the Board of Vocational Nursing and
6 Psychiatric Technicians. Respondent understands and agrees that counsel for Complainant and
7 the staff of the Board of Vocational Nursing and Psychiatric Technicians may communicate
8 directly with the Board regarding this stipulation and settlement, without notice to or participation
9 by Respondent. By signing the stipulation, Respondent understands and agrees that he may not
10 withdraw his agreement or seek to rescind the stipulation prior to the time the Board considers
11 and acts upon it. If the Board fails to adopt this stipulation as its Decision and Order, the
12 Stipulated Settlement and Disciplinary Order shall be of no force or effect, except for this
13 paragraph, it shall be inadmissible in any legal action between the parties, and the Board shall not
14 be disqualified from further action by having considered this matter.

15 11. The parties understand and agree that facsimile copies of this Stipulated Settlement
16 and Disciplinary Order, including facsimile signatures thereto, shall have the same force and
17 effect as the originals.

18 12. This Stipulated Settlement and Disciplinary Order is intended by the parties to be an
19 integrated writing representing the complete, final, and exclusive embodiment of their agreement.
20 It supersedes any and all prior or contemporaneous agreements, understandings, discussions,
21 negotiations, and commitments (written or oral). This Stipulated Settlement and Disciplinary
22 Order may not be altered, amended, modified, supplemented, or otherwise changed except by a
23 writing executed by an authorized representative of each of the parties.

24 13. In consideration of the foregoing admissions and stipulations, the parties agree that
25 the Board may, without further notice or formal proceeding, issue and enter the following
26 Disciplinary Order:

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DISCIPLINARY ORDER

IT IS HEREBY ORDERED that Respondent Glenn Allen Watson's application for licensure as a psychiatric technician is granted and that a Psychiatric Technician License will be issued and automatically revoked. The revocation will be stayed and the Respondent placed on three (3) years probation on the following terms and conditions.

1. **OBEY ALL LAWS.** Respondent shall obey all federal, state and local laws, including all statutes and regulations governing the license. Respondent shall submit, in writing, a full and detailed account of any and all violations of the law, including alleged violations, to the Board within five (5) days of occurrence.

To ensure compliance with this condition, respondent shall submit fingerprints through the Department of Justice and Federal Bureau of Investigation within thirty (30) days of the effective date of the decision, unless the Board determines that fingerprints were previously submitted by the respondent to the Board.

Respondent shall also submit to the Board a recent 2" x 2" photograph of himself within thirty (30) days of the effective date of the decision.

If respondent is under a criminal court order, including probation or parole, and the order is violated, it shall be deemed a violation of these probation conditions.

2. **COMPLIANCE WITH PROBATION PROGRAM.** Respondent shall fully comply with the conditions of probation established by the Board and shall cooperate with representatives of the Board in its monitoring and investigation of the respondent's compliance with the Probation Program.

Upon successful completion of probation, the respondent's license will be fully restored.

3. **SUBMIT WRITTEN REPORTS.** Respondent shall submit or cause to be submitted, under penalty of perjury, any written reports, declarations and verification of actions as required by the Board or its representatives. These reports or declarations shall contain statements relative to respondent's compliance with all the conditions of the Board's Program. Respondent shall immediately execute all release of information forms as may be required by the Board or its representatives.

1 In the first report, Respondent shall provide a list of all states and territories where he has
2 ever been licensed as a vocational/practical nurse, psychiatric technician, or registered nurse.
3 Respondent shall provide information regarding the status of each license and any change in
4 license status during the period of probation. Respondent shall inform the Board if he applies for
5 or obtains a new nursing or psychiatric technician license during the period of probation.

6 Respondent shall provide a copy of the Board's decision to the regulatory agency in every
7 state and territory in which he has applied for or holds a vocational/practical nurse, psychiatric
8 technician and/or registered nurse license.

9 **4. NOTIFICATION OF ADDRESS AND TELEPHONE NUMBER CHANGE(S).**

10 Respondent shall notify the Board, in writing, within five (5) days of any change in address or
11 telephone number(s).

12 Respondent's failure to claim mail sent by the Board may be deemed a violation of these
13 probation conditions.

14 **5. NOTIFICATION OF RESIDENCY OR PRACTICE OUTSIDE OF STATE.**

15 Respondent shall notify the Board, in writing, within five (5) days, if he leaves California to
16 reside or practice in another state. Periods of residency or practice outside of California shall not
17 apply toward a reduction of this probation time period. If Respondent resides or practices outside
18 of California, the period of probation shall be automatically extended for the same time period he
19 resides or practices outside of California. The respondent shall provide written notice to the
20 Board within five (5) days of any change of residency or practice.

21 Respondent shall notify the Board, in writing, within five (5) days, upon his return to
22 California.

23 **6. MEETINGS WITH BOARD REPRESENTATIVE(S).** Respondent shall appear
24 in person at meetings as directed by the Board or its designated representatives.

25 **7. NOTIFICATION TO EMPLOYER(S).** When currently employed or applying for
26 employment in any capacity in any health care profession, Respondent shall notify his employer
27 of the probationary status of respondent's license. This notification to the respondent's current
28 health care employer shall occur no later than the effective date of the Decision. The respondent

1 shall notify any prospective health care employer of his probationary status with the Board prior
2 to accepting such employment. At a minimum, this notification shall be accomplished by
3 providing the employer or prospective employer with a copy of the Board's Accusation and
4 Disciplinary Decision.

5 The Health Care Profession includes, but is not limited to: Licensed Vocational Nurse,
6 Psychiatric Technician, Registered Nurse, Medical Assistant, Paramedic, Emergency Medical
7 Technician, Certified Nursing Assistant, Home Health Aide, and all other ancillary technical
8 health care positions.

9 Respondent shall cause each health care employer to submit to the Board all performance
10 evaluations and any other employment related reports as required by the Board. Respondent shall
11 notify the Board, in writing, of any difficulty in securing employer reports within five (5) days of
12 such an event.

13 Respondent shall notify the Board, in writing, within five (5) days of any change in
14 employment status. Respondent shall notify the Board, in writing, if he is terminated or
15 separated, regardless of cause, from any nursing or health care related employment with a full
16 explanation of the circumstances surrounding the termination or separation.

17 **8. EMPLOYMENT REQUIREMENTS AND LIMITATIONS.** Respondent shall
18 work in his licensed capacity in the state of California. This practice shall consist of no less than
19 six (6) continuous months and of no less than twenty (20) hours per week.

20 Respondent shall not work for a nurses' registry or in any private duty position, a temporary
21 nurse placement agency, as a faculty member in an accredited or approved school of nursing, or
22 as an instructor in a Board approved continuing education course except as approved, in writing,
23 by the Board. Respondent shall work only on a regularly assigned, identified and predetermined
24 work site(s) and shall not work in a float capacity except as approved, in writing, by the Board.

25 **9. SUPERVISION REQUIREMENTS.** Before commencing or continuing
26 employment in any health care profession, respondent shall obtain approval from the Board of the
27 supervision provided to the respondent while employed.

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1 Respondent shall not function as a charge nurse (i.e., work in any healthcare setting as the
2 person who oversees or directs licensed vocational nurses, psychiatric technicians, certified
3 nursing assistants or unlicensed assistive personnel) or supervising psychiatric technician during
4 the period of probation except as approved, in writing, by the Board.

5 10. **COMPLETION OF EDUCATIONAL COURSE(S).** Respondent, at his own
6 expense, shall enroll and successfully complete a course(s) substantially related to the violation(s)
7 no later than the end of the first year of probation.

8 The coursework shall be in addition to that required for license renewal. The Board shall
9 notify the respondent of the course content and number of contact hours required. Within thirty
10 (30) days of the Board's written notification of assigned coursework, Respondent shall submit a
11 written plan to comply with this requirement. The Board shall approve such plan prior to
12 enrollment in any course of study.

13 Upon successful completion of the course, respondent shall submit "original" completion
14 certificates to the Board within thirty (30) days of course completion.

15 11. **MAINTENANCE OF VALID LICENSE.** Respondent shall, at all times, maintain
16 an active current license with the Board including during any period of suspension.

17 If an initial license must be issued (Statement of Issues) or a license is reinstated, probation
18 shall not commence until a license is issued by the Board. Respondent must complete the
19 licensure process within two (2) years from the effective date of the Board's decision.

20 Should Respondent's license expire, by operation of law or otherwise, upon renewal or
21 reinstatement, Respondent's license shall be subject to any and all conditions of this probation not
22 previously satisfied.

23 12. **LICENSE SURRENDER.** During probation, if respondent ceases practicing due to
24 retirement, health reasons, or is otherwise unable to satisfy the conditions of probation,
25 respondent may surrender his license to the Board. The Board reserves the right to evaluate
26 respondent's request and to exercise its discretion whether to grant the request without further
27 hearing. Upon formal acceptance of the tendered license, respondent will no longer be subject to
28 the conditions of probation.

1 Surrender of respondent's license shall be considered a disciplinary action and shall become
2 a part of Respondent's license history with the Board. A licensee who surrenders his license may
3 petition the Board for reinstatement no sooner than the following minimum periods from the
4 effective date of the disciplinary decision for the surrender:

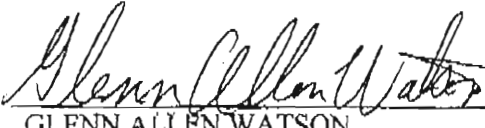
5 Three (3) years for reinstatement of a license surrendered for any reason other than a mental
6 or physical illness; or One (1) year for a license surrendered for a mental or physical illness.

7 **11. VIOLATION OF PROBATION.** If respondent violates the conditions of his
8 probation, the Board, after giving the respondent notice and an opportunity to be heard, may set
9 aside the stay order and impose the stayed discipline (revocation) of the respondent's license. If
10 during probation, an accusation or petition to revoke probation has been filed against the
11 respondent's license or the Attorney General's Office has been requested to prepare an accusation
12 or petition to revoke probation against the respondent's license, the probationary period shall
13 automatically be extended and shall not expire until the accusation or petition has been acted
14 upon by the Board.

15 **ACCEPTANCE**

16 I have carefully read the Stipulated Settlement and Disciplinary Order. I understand the
17 stipulation and the effect it will have on my Psychiatric Technician License. I enter into this
18 Stipulated Settlement and Disciplinary Order voluntarily, knowingly, and intelligently, and agree
19 to be bound by the Decision and Order of the Board of Vocational Nursing and Psychiatric
20 Technicians.

21
22 DATE: 2/26/10


23 GLENN ALLEN WATSON
Respondent

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ENDORSEMENT

The foregoing Stipulated Settlement and Disciplinary Order is hereby respectfully submitted for consideration by the Board of Vocational Nursing and Psychiatric Technicians of the Department of Consumer Affairs.

Dated: Feb. 26, 2010

Respectfully Submitted,

EDMUND G. BROWN JR.
Attorney General of California
LINDA K. SCHNEIDER
Supervising Deputy Attorney General


MARICHELLE S. TAHIMIC
Deputy Attorney General
Attorneys for Complainant

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Exhibit A

Statement of Issues No. PT-2007-945

1 EDMUND G. BROWN JR., Attorney General
of the State of California
2 LINDA K. SCHNEIDER, State Bar No. 101336
Supervising Deputy Attorney General
3 MARICHELE S. TAHIMIC, State Bar No. 147392
California Department of Justice
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San Diego, CA 92101
5 P.O. Box 85266
6 San Diego, CA 92186-5266
Telephone: (619) 645-3154
7 Facsimile: (619) 645-2061

8 Attorneys for Complainant

9
10 **BEFORE THE**
BOARD OF VOCATIONAL NURSING AND PSYCHIATRIC TECHNICIANS
11 **DEPARTMENT OF CONSUMER AFFAIRS**
STATE OF CALIFORNIA

12 In the Matter of the Statement of Issues Against:

Case No. PT-2007-945

13 **GLENN ALLEN WATSON**

14 21064 Box Springs Road, Apt. 113
15 Moreno Valley, California 92557

STATEMENT OF ISSUES

16 Respondent.

17
18 Complainant alleges:

19 **PARTIES**

20 1. Teresa Bello-Jones, J.D., M.S.N., R.N. (Complainant), brings this Statement of
21 Issues solely in her official capacity as the Executive Officer of the Board of Vocational Nursing
22 and Psychiatric Technicians ("Board"), Department of Consumer Affairs.

23 2. On or about June 22, 2007, the Board received an Application for licensure as a
24 Psychiatric Technician from Glenn Allen Watson ("Respondent"). On or about June 4, 2007,
25 Respondent certified under penalty of perjury to the truthfulness of all statements, answers, and
26 representations in the application. On or about June 10, 2008, the Board denied Respondent's
27 application. Respondent was notified of the right to a hearing to appeal that denial.

28 ///

3. On or about August 17, 2008, Respondent requested a hearing to appeal the denial of his application.

JURISDICTION

4. This Statement of Issues is brought before the Board under the authority of the following laws. All section references are to the Business and Professions Code unless otherwise indicated.

5. Code section 485 states:

“Upon denial of an application for a license under this chapter or Section 496, the board shall do either of the following:

“(a) File and serve a statement of issues in accordance with Chapter 5 (commencing with Section 11500) of Part 1 of Division 3 of Title 2 of the Government Code.

“(b) Notify the applicant that the application is denied, stating (1) the reason for the denial, and (2) that the applicant has the right to a hearing under Chapter 5 (commencing with Section 11500) of Part 1 of Division 3 of Title 2 of the Government Code if written request for hearing is made within 60 days after service of the notice of denial. Unless written request for hearing is made within the 60-day period, the applicant’s right to a hearing is deemed waived.

“ ”

STATUTORY PROVISIONS

6. Code section 480 states, in pertinent part:

“(a) A board may deny a license regulated by this code on the grounds that the applicant has one of the following:

“ ”

“(3) Done any act that if done by a licentiate of the business or profession in question, would be grounds for suspension or revocation of license.

“ ”

7. Code section 4511 states:

“An applicant for a psychiatric technician’s license shall have the following qualifications:

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“ . . .

“(d) Have committed no act which, if committed by a licensed psychiatric technician, would be ground for disciplinary action.”

7. Code section 4520 provides, in pertinent part, that the Board may discipline any licensed psychiatric technician for any reason provided in Article 3 (commencing with section 4520) of the Psychiatric Technicians Law (Code § 4500, et. seq.)

8. Code section 4521 states:

“The board may suspend or revoke a license issued under this chapter for the following reason:

“(a) Unprofessional conduct, which includes but is not limited to any of the following:

“ . . .

“(i) The use of excessive force upon or the mistreatment or abuse of any patient.

“”

9. Code section 4521.6 states:

“The board may deny any application or may suspend or revoke any license or permit issued under this chapter, for any of the following:

“ . . .

“(b) The denial of licensure, suspension, restriction of license, or voluntary surrender following the initiation of disciplinary action by another California health care professional licensing board shall constitute grounds for denial of a permit or license or for disciplinary action against a licensee. A certified copy of the decision or judgment shall be conclusive evidence of that action.”

10. Section 482 of the Code states:

“Each board under the provisions of this code shall develop criteria to evaluate the rehabilitation of a person when:

“(a) Considering the denial of a license by the board under Section 480; or

“(b) Considering suspension or revocation of a license under Section 490.

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1 "Each board shall take into account all competent evidence of rehabilitation furnished by
2 the applicant or licensee."

3 11. Title 16, of the California Code of Regulations, section 2579 sets forth the
4 following rehabilitation criteria:

5 "When considering a) the denial of a license under Section 480 of the Business and
6 Professions Code, ..., the Board, in evaluating the rehabilitation of the of an individual and his or
7 her present eligibility for a license, will consider the following criteria:

8 "(1) The nature and severity of the act(s) or offense(s) under consideration.

9 "(2) Actual or potential harm to the public.

10 "(3) Actual or potential harm to any patient.

11 "(4) Overall disciplinary record.

12 "(5) Overall criminal actions taken by any federal, state or local agency or court.

13 "(6) Prior warnings on record or prior remediation.

14 "(7) Number and/or variety of current violations.

15 "(8) Mitigation evidence.

16 "(9) In case of a criminal conviction, compliance with terms of sentence and/or court-
17 ordered probation.

18 "(10) Time passed since the act(s) or offense(s) occurred.

19 "(11) If applicable, evidence of proceedings to dismiss a conviction pursuant to Penal
20 Code section 1203.4.

21 "(12) Cooperation with the Board and other law enforcement or regulatory agencies.

22 "(13) Other rehabilitation evidence.

23 **FIRST CAUSE FOR DENIAL OF APPLICATION**

24 **(Disciplinary Action by the Board of Vocational Nursing and Psychiatric Technicians)**

25 12. Respondent's application is subject to denial under Code section 4521.6(b) in that
26 on October 5, 2003, pursuant to a Stipulated Settlement and Disciplinary Order in Accusation
27 No. 6443, the Board of Vocational Nursing and Psychiatric Technicians revoked Respondent's
28 Vocational Nurse License Number VN160731. The revocation was stayed and Respondent was

1 placed on probation for a period of three (3) years with terms and conditions. Respondent
2 admitted to the truth of each and every charge and allegation in Accusation No. 6443 in the
3 Stipulated Settlement and Disciplinary Order.

4 13. Accusation No. 6443, which Respondent admitted to be true alleged:

5 a. On August 9, 2000, while on duty as a licensed vocational nurse at
6 Arrowhead Regional Medical Center, Behavioral Health Department, in Colton, California,
7 Respondent used excessive force on patient, D.S. D.S. was a 17 year old male with a history of a
8 phobia of being touched.

9 b. Respondent got up on the patient's bed, placed his knee on D.S.'s back,
10 bent D.S.'s hand back and told him to "Shut the [expletive] up."

11 c. Respondent continued to touch and taunt D.S. saying "I'll touch you
12 anyway I want. You are in behavioral health and you will do what we say", and "Oh, you are
13 really gonna get touched now" even after D.S. was restrained.

14 **SECOND CAUSE FOR DENIAL OF APPLICATION**

15 **(Unprofessional Conduct - Use of Excessive Force or Mistreatment of Patient)**

16 14. Respondent's application is subject to denial under Code sections 480(a)(3), 4511
17 and 4521(i), in that Respondent committed acts which if done by a licentiate of the profession
18 would constitute grounds for discipline, specifically Respondent used excessive force or
19 mistreated patient D.S. as more particularly set forth in the Stipulated Settlement and
20 Disciplinary Order and attached Accusation No. 6443, as set forth more fully in paragraph 13,
21 above.

22 **THIRD CAUSE FOR DENIAL OF APPLICATION**

23 **(Unprofessional Conduct in the Discourteous Treatment of Other Employees)**

24 15. Respondent's application is subject to denial under Code sections 480(a)(3), 4511
25 and 4521(a) in that on April 28, 2005, Respondent was disciplined by his employer, County of
26 San Bernardino's Arrowhead Regional Medical Center, arising from discourteous treatment of
27 other employees, neglect of duties and insubordination, among others, during Respondent's
28 employment as a licensed vocational nurse. The circumstances are as follows.

1 16. On February 2, 2005, nurse N.R. arrived for duty in the "old" triage area of
2 inpatient Behavioral Health. N.R. noticed a patient whose behavioral symptoms were escalating.
3 N.R. called the charge nurse, H.N., to call a doctor for medication. H.N. was in the middle of
4 preparing the morning report and asked N.R. or Respondent to call the doctor. Respondent was
5 working with N.R. in the "old" triage area. N.R. asked Respondent to call the doctor. Instead of
6 calling the doctor, Respondent left the "old" triage area, stormed into the nurses' station in a
7 different area by pushing and kicking open the door with his foot and hitting the door with his
8 fist. H.N. was seated in a chair with her back toward the door when Respondent banged his fist
9 on the back of H.N.'s chair several times. When H.N. turned around, Respondent shook his
10 finger within arm's length of H.N.'s face and stated in a loud voice, "You call the doctor, why
11 can't you call! You call the doctor!" and as Respondent left the area, he said, "It sucks!"
12 Following the incident, Respondent made derogatory comments about H.N. to other staff
13 members and also discussed his training in the Army Special Forces as a sniper and how he
14 could "take someone out at 500 yards."

15 17. As a result of this incident, Respondent's employer sent Respondent a Notice of
16 Proposed Dismissal on March 14, 2005 charging him with violation of the County of San
17 Bernardino Personnel Rules pertaining to discourteous treatment of the public or other
18 employees, among other things, and violation of the County's policy of zero tolerance for
19 violence and threats in the workplace. Respondent and his employer entered into a settlement
20 whereby Respondent agreed to submit a letter of resignation in lieu of termination on April 28,
21 2005.

22 AGGRAVATING FACTORS

23 18. In considering the grant or denial of Respondent's application for licensure,
24 Complainant further alleges that on May 20, 1999, the Board of Vocational Nursing and
25 Psychiatric Technicians sent Respondent a letter warning that any future substantiated
26 complaints that Respondent has engaged in unprofessional conduct or violated the laws and
27 regulations governing Respondent's profession as a licensed vocational nurse may result in

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1 formal disciplinary action. The letter from the Board arose from a complaint to the Board that
2 Respondent used excessive force upon, or mistreated or abused a patient.


3 19. The circumstances of that complaint are that on or about June 19, 1998,
4 Respondent and two psychiatric technicians, E.T. and V.S., searched a male patient of the
5 County of San Bernardino, Department of Behavioral Health, patient "I.B.", for matches in the
6 facility's hallway. During the search, Respondent and the two psychiatric technicians had I.B.
7 put his hands up against the wall and frisked him in front of other patients, then took him to his
8 room and made him drop his pants in front of the female psychiatric technician, V.S., causing
9 I.B. embarrassment.

10 **PRAYER**

11 **WHEREFORE**, Complainant requests that a hearing be held on the matters herein
12 alleged, and that following the hearing, the Board of Vocational Nursing and Psychiatric
13 Technicians issue a decision:

- 14 1. Denying the application of Glenn Allen Watson for a psychiatric technician
15 license; and,
16 2. Taking such other and further action as deemed necessary and proper.

17 DATED: July 20, 2009

18 
19 TERESA BELLO-JONES, J.D., M.S.N., R.N.
20 Executive Officer
21 Board of Vocational Nursing and Psychiatric Technicians
22 Department of Consumer Affairs
23 State of California
24 Complainant
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